

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE et al

Plaintiffs,

V.

JASON GOODMAN et al

Defendants.

Case 3:17-cv-601-MHL

**PLAINTIFFS' MEMORANDUM IN SUPPORT  
OF MOTION FOR A PROTECTIVE ORDER**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, pursuant to Local Civil Rule 7(F), respectfully submit this Memorandum in Support of their motion for a protective order.

1. Discovery in this matter will necessarily involve the identification and disclosure of confidential and proprietary information, including the names of Plaintiffs' donors, supporters and witnesses.

2. In order to preserve the confidentiality of certain documents and information, ensure the privacy of witnesses, and facilitate discovery, the Court should enter a Protective Order.

3. Without a Protective Order, Defendant Goodman is at liberty to harass Plaintiffs' witnesses, to publish (dox) the names, email addresses and telephone numbers of those persons in his videos, subjecting those witnesses to potential harm, and to disclose otherwise confidential financial information on the Internet and via social media.

4. Good cause exists for the entry of a Protective Order.

**CONCLUSION**

For the reasons stated above, Plaintiffs respectfully request the Court to grant their motion for a protective order.

DATED: June 24, 2019

ROBERT DAVID STEELE  
EARTH INTELLIGENCE NETWORK

By: /s/Steven S. Biss  
Steven S. Biss (VSB # 32972)  
300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 24, 2019 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel for Defendant, Patricia A. Negron, and all interested parties receiving notices via CM/ECF. I also certify that a copy of this pleading was emailed in PDF to Defendants, Goodman and Lutzke

By: /s/Steven S. Biss  
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300 West Main Street, Suite 102  
Charlottesville, Virginia 22903  
Telephone: (804) 501-8272  
Facsimile: (202) 318-4098  
Email: [stevenbiss@earthlink.net](mailto:stevenbiss@earthlink.net)

*Counsel for the Plaintiffs*